



UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA

\* CRIMINAL NO. 07-331

Keyandra  
PRECIOUS ALEXANDER

\* SECTION: "B" (4)

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## FACTUAL BASIS

Were this matter brought to trial the United States would prove, through competent witnesses and documentary evidence, the following beyond a reasonable doubt.

From in or about June 2003 until in or about April 2004 in the Eastern District of Louisiana and elsewhere, PRECIOUS ALEXANDER (Alexander) and others conspired to commit the crime of access device fraud. Specifically, Alexander and others together agreed to use stolen credit card numbers to purchase cellular telephone equipment and air time. Alexander knew the unlawful purpose of the agreement and joined in it willfully, that is with the intent to further unlawful purpose of the conspiracy.

In addition, during the time of the conspiracy, Alexander purchased the Alltel Wireless Nokia cellular telephone described in the bill of information. Alexander knowingly committed this overt

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act to accomplish the purpose of the conspiracy. As a direct result of her activity in the unlawful conspiracy, Alexander caused Alltel Wireless to incur a loss of \$10,876.37.

After being advised of her constitutional rights, Alexander admitted the foregoing facts to agents of the United States Secret Service.

Precious Alexander  
PRECIOUS ALEXANDER  
Defendant

02/07/08  
DATE

Catherine I. Chavarri  
CATHERINE I. CHAVARRI, ESQ.  
Counsel for Precious Alexander

02/07/08  
DATE

Irene González  
IRENE GONZÁLEZ  
Assistant United States Attorney

2/7/08  
DATE